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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

RUBEN JUAREZ, an individual and
ISELA HERNANDEZ, an individual

Plaintiffs,

v.

PRECISION VALVE & AUTOMATION,
Inc., a corporation and DOES 1-20

Defendants.

Case No.: 2:17-cv-03342

**DECLARATION OF MANUEL
GUTIERREZ IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANT PRECISION VALVE &
AUTOMATION, INC.'S MOTION FOR
SUMMARY JUDGMENT**

Date: October 1, 2018

Time: 1:30 p.m.

Ctrm: 5D, 5th Floor

Judge: Hon. Otis D. Wright II

DECLARATION OF MANUEL GUTIERREZ

I, MANUEL GUTIERREZ, hereby declare as follows:

1. I have personal knowledge of the facts stated herein and, if called to do so, could and would competently testify thereto under oath.

2. I am a former employee of Space X. While working at Space X in 2012, my formal job title was "Technician."

3. While working at Space X, I worked inside the conformal coating room helping Francisco.

4. Based on my experience working with Space X, there were no Standards of Practice documents available in the conformal coating area. Further, there were no MSDS sheets in the conformal coating area. Also, I do not recall ever seeing a binder of the MSDS sheets.

5. As a technician, I saw employees mix chemicals. In fact, I remember seeing Francisco mix chemicals, but I never saw Ruben Juarez mix chemicals. I saw Ruben Juarez assist with the fixtures and programming the PVA 350.

6. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 6th day of September, 2018, at Los Angeles, California.


MANUEL GUTIERREZ